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*Attorneys for Defendants*

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF OREGON  
MEDFORD DIVISION**

**BLUE MOUNTAINS BIODIVERSITY PROJECT**, an Oregon non-profit corporation,

Plaintiff,

V.

**HOMER WILKES**, in his official capacity as Undersecretary for Natural Resources and Environment, United States Department of Agriculture; **GLENN CASAMASSA**, in his official capacity as Regional Forester for Region 6; **SHANE JEFFRIES**, in his official capacity as Forest Supervisor of the Ochoco National Forest; **MICHAEL RAMSEY**, in his official capacity as District Ranger for the Lakeview Ranger District, Fremont Winema National Forest; and the **UNITED STATES FOREST SERVICE**.

Defendants.

Case No. 1:22-cv-01500-CL

# JOINT STATUS REPORT

The Parties hereby submit a joint status report in accordance with the Court's Order of August 27, 2024. ECF No. 51. After conferring, the Parties seek a further 60-day stay of all litigation deadlines to attempt to settle this case in the wake of the order vacating the Eastside Screens Amendment in *Greater Hells Canyon Council v. Wilkes*, 2:22-cv-00859-HL, and Defendants' recent decision not to appeal that order. Accordingly, the Parties ask for a joint status report due date 60 days from the due date of this status report wherein the Parties will apprise the Court of any relevant developments in the case and ask for an extension of the stay, a resumption of deadlines, or apprise the Court of a settlement resolving the case.

No Party will be prejudiced by the requested 60-day stay given that the Eastside Screens Amendment has been vacated, and the Forest Service will not implement the portions of the South Warner Project relying on the Eastside Screens Amendment during the stay. The requested stay may also be a resource-saving measure if the Parties are able to resolve the case without further litigation.

Respectfully submitted this 21st day of October, 2024.

/s/ Thomas Buchele (with permission)  
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